

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., *et al.*,

Plaintiffs,

V.

GRATO INTERNATIONAL, *et al.*

## Defendants.

CASE NO. 2:22-cv-01205-RSL

## ORDER DENYING MOTION FOR APPOINTMENT OF COUNSEL

This matter comes before the Court on defendant Rizwan Iqbal's letter request for court-appointed counsel. Dkt. # 61.

Generally, a person has no right to counsel in civil actions. *See Storseth v. Spellman*, 654 F.2d 1349, 1353 (9th Cir. 1981). However, a court may under “exceptional circumstances” appoint counsel for indigent civil litigants pursuant to 28 U.S.C. § 1915(e)(1). *Agyeman v. Corrs. Corp. of Am.*, 390 F.3d 1101, 1103 (9th Cir. 2004). When determining whether “exceptional circumstances” exist, a court must consider “the likelihood of success on the merits as well as the ability of the petitioner to articulate his claims pro se in light of the complexity of the legal issues involved.” *Weygandt v. Look*, 718 F.2d 952, 954 (9th Cir. 1983). Neither of these considerations is dispositive and instead must be viewed together. *Wilborn v. Escalderon*, 789 F.2d 1328, 1331 (9th Cir. 1986).

*Palmer v. Valdez*, 560 F.3d 965, 970 (9th Cir. 2009). In addition, the party seeking appointment of counsel must show indigency. 29 U.S.C. § 1915(e)(1).

1 Mr. Iqbal has not provided any information regarding his financial situation, the  
2 merits of the case, or his capacity to understand and defend himself from the claims  
3 asserted in this litigation. The only argument made in support of the request for court-  
4 appointed counsel is that Mr. Iqbal is in Canada and it would be difficult for him to  
5 manage counsel in Seattle, Washington. But that problem will persist regardless of whether  
6 Mr. Iqbal retains counsel or counsel is appointed by the Court.

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8 Mr. Iqbal has not shown the sort of exceptional circumstances that justify  
9 appointment of counsel at the public's expense. The motion for appointment of counsel is  
10 therefore DENIED.

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13 DATED this 2nd day of May, 2025.

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17 Robert S. Lasnik  
18 United States District Judge  
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